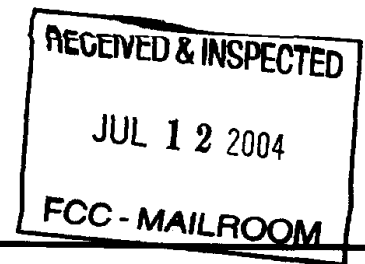




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June 30, 2004 **West River Telecom**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and  
Compensation Provisions of the Telecommunications Act of 1996,  
CC Docket 96-128

Dear Ms. Dortch:

West River Telecommunications Cooperative (WRT), providing interexchange telecommunications services under the name of West River Long Distance, submits this letter and accompanying certification as record that WRT is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")<sup>1</sup>, released on October 3, 2003, respecting the obligations of Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As WRT is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, WRT is not subject to such requirements at this time. If WRT operations are altered to the extent that WRT necessarily becomes a Completing Carrier, WRT intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

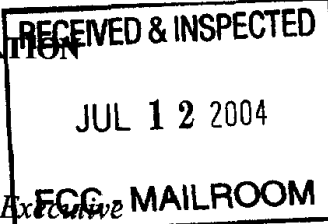
Albert (Mick) Grosz  
CEO/General Manager

cc: Ms. Ruth Jaeger  
President  
APCC Services, Inc.  
625 Slater Lane, Suite 104  
Alexandria, Virginia 22314

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<sup>1</sup> The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION  
OF WRT COMMUNICATIONS INC**



1. My name is Albert (Mick) Grosz. I currently serve as the *Chief Executive Officer* of West River Telecommunications Cooperative, (WRT) a provider of interstate interexchange telecommunications services under the name of West River Long Distance, as a toll reseller in the State of North Dakota. In this capacity, I have become familiar with the network operations of WRT and its practices associated with the completion of calls originated from Pay Telephones.
2. WRT is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless access code calls, WRT is a switchless reseller. WRT contracts with Global Crossing for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, WRT is a switchless reseller. WRT contracts with Global Crossing for completion subscriber toll-free calls.
5. WRT does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. WRT does not create call detail records for either access code calls or subscriber toll-free payphone calls. West River Telecommunications action with respect to call detail records is limited to rating and billing.
7. WRT compensates Global Crossing for the wholesale cost of the call.
8. WRT has confirmed with Global Crossing that any calls purchased by WRT are included in the respective call tracking systems and compensation remittance process of Global Crossing.
9. In consideration of the aforementioned facts, WRT is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 30, 2004.

  
\_\_\_\_\_  
Albert (Mick) Grosz  
CEO/General Manager  
West River Telecommunications Cooperative  
PO Box 467, Hazen, ND 58545

<sup>1</sup> The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).